

1 HONORABLE JUDGE RICARDO S. MARTINEZ
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JENNIFER P. SCHWEICKERT,

Plaintiff,

v.

HUNTS POINT VENTURES, INC; HUNTS
POINT VENTURE GROUP, LLC; CHAD
RUDKIN and ELIZABETH RUDKIN, and
their marital community comprised thereof;
JOHN DU WORS and AMBER DU WORS,
and their marital community comprised
thereof; and DOES 1-4;

Defendants.

Case Number: 2:13-cv-00675-RSM

**DECLARATION OF REED YURCHAK
IN OPPOSITION TO DEFENDANT DU
WORS' MOTION FOR SUMMARY
JUDGEMENT**

**NOTED FOR HEARING:
NOVEMBER 7, 2014**

I, REED YURCHAK, hereby declare as follows:

I am an attorney duly licensed to practice before this honorable court and am one of the
attorneys of record for plaintiff Jennifer Schweickert in the above-entitled matter and have
personal knowledge of the following facts and if called as a witness would competently testify
hereto.

DECLARATION OF REED YURCHAK — 1
SCHWEICKERT V. DU WORS ET AL.

LAW OFFICE OF REED YURCHAK
40 Lake Bellevue Dr. #100
Bellevue, WA 98005
TELE: 425-890-3883; FAX: 425-654-1205

1. Attached hereto as Exhibit "A" for the court's convenience is a true and correct copy
2 of the declaration of Stephen James Schweickert, without the attached Exhibits.
3. Attached hereto as Exhibit "B" for the court's convenience is a true and correct copy
4 of the declaration of Doug Lower, without the attached Exhibits.
5. Attached hereto as Exhibit "C" is a true and correct copy of the deposition of Jennifer
6 Schweickert, volumes 1 and 2.
7. Attached hereto as Exhibit "D" is a true and correct copy of the deposition of John Du
8 Wors, from both the instant case (two volumes), and from Phillips v. Du Wors, et al.
9 (one volume). I attach the full depositions for the court's convenience, but have cited
10 to specific pages in the depositions herein.
11. Attached hereto as Exhibit "E" is a true and correct copy of the excerpts from the
12 deposition of Elizabeth Rudkin.
13. Attached hereto as Exhibit "F" is a true and correct copy of the excerpts from the
14 deposition of Chad Rudkin.
15. Attached hereto as Exhibit "G" is a true and correct copy of Defendant Du Wors'
16 Responses to Interrogatories.
17. Attached hereto as Exhibit "H" is a true and correct copy of Defendant Du Wors'
18 Response to Notice to Produce, with a copy of the "IP Sales Agreement" referred to
19 herein.
20. Attached hereto as Exhibit "I" is a true and correct copy of the Notice of Shareholder
21 Meeting sent to Plaintiff and referred to herein.
22. Attached hereto as Exhibit "J" are true and correct copies of the "Notes for HPV"
23 prepared by Elizabeth Rudkin.

11. Attached hereto as Exhibit "K" are true and correct copies of the billing records from
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2 Newman & Du Wors referred to herein.

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4 12. Attached hereto as Exhibit "L" are true and correct copy of a memo by Michael Spain
5
6 of Newman & Du Wors.

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8 I declare under penalty of perjury under the laws of the United States that the foregoing is
9 true and correct to the best of my knowledge.

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11 Executed this 3rd day of November, 2014, at Bellevue, Washington.

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By: /s/ Reed Yurchak
Reed Yurchak, WSBA #37366
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